

LEV L. DASSIN

Acting United States Attorney for the
Southern District of New York

By: DAVID S. JONES

JEFFREY S. OESTERICH

MATTHEW L. SCHWARTZ

JOSEPH N. CORDARO

Assistant United States Attorneys

86 Chambers Street, Third Floor

New York, New York 10007

Telephone: (212) 637-2800

Facsimile: (212) 637-2750

Hearing Date: June 30, 2009

Hearing Time: 9:00 AM

- and -

John J. Rapisardi, Esq.

CADWALADER, WICKERSHAM & TAFT LLP

One World Financial Center

New York, New York 10281

Telephone: (212) 504-6000

Facsimile: (212) 504-6666

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	::	
In re:	::	Chapter 11
	::	
GENERAL MOTORS CORP., <i>et al.</i> ,	::	Case No. 09-50026 (REG)
	::	
Debtors.	::	(Jointly Administered)
-----	X	

**AMENDED EVIDENCE AND WITNESS LIST OF THE UNITED STATES OF
AMERICA FOR THE HEARING TO CONSIDER DEBTORS' MOTION PURSUANT
TO 11 U.S.C. §§ 105, 363(b), (f), (k), (m) AND 365, AND FED. R. BANKR. P. 2002, 6004
AND 6006, TO APPROVE (A) THE SALE PURSUANT TO THE MASTER SALE AND
PURCHASE AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS LLC, A U.S.
TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS,
ENCUMBRANCES AND OTHER INTERESTS; (B) THE ASSUMPTION AND
ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED
LEASES; AND (C) OTHER RELIEF**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

The United States of America (the “Government”) hereby identifies the following individual as a witness whom the Government may call at the June 30, 2009 hearing on the Debtors’ Asset Sale Motion [docket no. 92]:

WITNESS	TITLE
Harry Wilson	Senior Member of the Auto Team

In addition, the Government may use the following physical or documentary evidence at the June 30, 2009 hearing on the Debtors’ Asset Sale Motion [docket no. 92]:

EXHIBIT	TITLE
1	Declaration of Harry Wilson, and Exhibits Thereto [docket no. 2577]
2	Intercreditor Agreement, among CITICORP USA, INC., as agent for the Bank Priority Secured Parties, CITICORP USA, INC., as agent for the Hedge Priority Secured Parties, THE UNITED STATES DEPARTMENT OF THE TREASURY, as lender, GENERAL MOTORS CORPORATION and each of the Subsidiaries and Affiliates of GM that are signatories, dated as of February 11, 2009
3	First Amendment and Consent to the Amended and Restated Credit Agreement, dated as of July 20, 2006, among General Motors Corporation, General Motors of Canada Limited, Saturn Corporation, Citicorp USA, Inc., as administrative agent for the Lenders thereunder, JPMorgan Chase Bank, N.A., as syndication agent and the several banks and other financial institutions from time to time parties thereto as lenders, dated as of February 11, 2009

4	Intercreditor Agreement, among GELCO CORPORATION d/b/a GE FLEET SERVICES, THE UNITED STATES DEPARTMENT OF THE TREASURY, for itself and other UST Secured Parties, and GENERAL MOTORS CORPORATION, dated as of February 17, 2009.
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The Government reserves the right to designate all or a portion of the transcripts of the depositions of Michael Raleigh, Frederick Henderson, or Harry Wilson. The Government further reserves the right to amend or supplement these lists should the need arise.

Dated: June 28, 2009
New York, New York

LEV L. DASSIN
Acting United States Attorney for the
Southern District of New York,
Attorney for the United States of America

By: /s/ Matthew L. Schwartz
DAVID S. JONES
JEFFREY S. OESTERICH
MATTHEW L. SCHWARTZ
JOSEPH N. CORDARO
Assistant United States Attorneys
86 Chambers Street, Third Floor
New York, New York 10007
Telephone: (212) 637-2739/2698/1945/2745
Facsimile: (212) 637-2750
E-mail: david.jones6@usdoj.gov
jeffrey.oestericher@usdoj.gov
matthew.schwartz@usdoj.gov
joseph.cordaro@usdoj.gov

John J. Rapisardi, Esq.
CADWALADER, WICKERSHAM & TAFT LLP
– Of Counsel to the Presidential
Task Force on the Auto Industry –
One World Financial Center
New York, New York 10281
Telephone: (212) 504-6000
Facsimile: (212) 504-6666
E-mail: john.rapisardi@cwt.com